

Rainbow's plans to expand significantly its local and regional program offerings are founded upon the notion that subscribers will respond to what is essentially the video and interactive version of a local newspaper. In this context, sports programming is critical to the success of Rainbow's local and regional programming objectives. The public has a high interest in sports; sports plays a vital role in developing and supporting local information, entertainment, and general interest editorial content. No one buys the Sunday newspaper without a sports section, and it would be unrealistic for Rainbow to expect consumers or distributors to buy the electronic equivalent of the Sunday paper without a sports component. The inclusion of some local professional sports programming will foster the development of Rainbow's new local and community programming services, and will not result in any meaningful diminution of sports programming available to viewers. To the contrary, an additional outlet for sports programming will mean that fans will have more choices, not fewer.

The Commission itself has recognized that allowing regional and local programming services to offer exclusive arrangements increases programming diversity. In granting NewsChannel's petition to offer its regional new service on an exclusive basis, the Commission concluded that "exclusivity may promote diversity in the programming market by providing incentives . . . to promote and carry a new and untested programming service."^{41/} The Commission found the incentives to be especially important because of the limited audience of a regional programming service. Preserving exclusivity for terrestrially-delivered local and regional programming also places such services on equal footing with the bulk of the new programming services competing for limited channel capacity on cable systems, most of which

^{41/} NewsChannel, 10 FCC Rcd at 695 ¶ 27.

are unaffiliated with cable operators and thereby free to employ exclusivity as a business strategy.^{42/}

III. THE COMMISSION SHOULD REJECT PROPOSALS TO CHANGE ITS PROGRAM ACCESS COMPLAINT PROCEDURES OR IMPOSE DAMAGES

The Commission has asked commenters to address a number of other issues raised in the Ameritech petition, including Ameritech's proposal to shorten the procedural schedule in the complaint process, to grant discovery to complainants as a matter of right, and to award damages for successful program access complaints. As a general matter, Cablevision believes these revisions are unnecessary and counterproductive and supports the comments of the National Cable Television Association opposing such revisions.^{43/} Cablevision will only briefly address two issues – the impact of discovery and damages.

A. An Automatic Right To Discovery Will Turn Program Access Complaints Into Full-Blown Litigation, Contrary To Congress's Intent

Allowing a program access complainant discovery as of right would undermine the rationale for the adoption of the program access complaint process. The complaint process was intended to be an expedited procedure, not full-blown litigation. To prevent such an outcome, the Commission left discovery in the hands of Commission staff, if the Commission needed additional information to resolve a dispute. The Commission should adopt its tentative

^{42/} Fourth Annual Video Competition Report at ¶ 163 (noting that “in 1997, 77 services reportedly intended to begin offering new programming service, most of which do not have MSO affiliations”).

^{43/} See generally In the Matter of Implementation of the Cable Television Consumer Protection and Competition Act of 1992 – Petition for Rulemaking of Ameritech New Media, Inc. Regarding Development of Competition and Diversity in Video Programming Distribution and Carriage, CS Docket No. 97-248, Comments of National Cable Television Association (filed Feb. 2, 1998).

conclusion that Commission-controlled discovery is adequate and that granting complainants discovery as of right would not “improve the quality or efficiency of the Commission’s resolution of program access complaints.”^{44/}

More important, discovery as of right would discourage negotiations to resolve program access disputes. With their deep pockets, the telephone companies could use just the threat of protracted, burdensome and expensive program access disputes as a tactic for wringing concessions from programmers to which they are not entitled. Moreover, granting the telephone companies and other competitors an automatic right to programming contracts would arm them with the most critical and sensitive business information a programmer possesses. Notwithstanding the confidentiality provisions set forth in the Commission’s program access rules – the protections of which are by no means guaranteed to programmers because they are addressed on a case-by-case basis – discovery as of right creates a substantial risk that programming contracts will fall into the hands of personnel involved in negotiations for distribution rights. The result would be to encourage competitors to bring program access suits to enhance their leverage in bargaining over distribution agreements.

Granting complainants discovery as of right clearly contravenes the Commission’s stated goal of “encourage[ing] resolution of program access disputes through negotiations between the parties in an effort to avoid time-consuming, complex adjudication.”^{45/} The Commission has

^{44/} Notice ¶ 44. Notwithstanding the existing rules, EchoStar has recently sought to initiate discovery against Rainbow, proffering a vastly overbroad discovery request for that irrelevant information dating back thirteen years. Rainbow has been forced to expend additional and unnecessary resources to defend this unauthorized and patently defective request. Such requests would become the rule rather than the exception if the Commission actually authorized complainant-initiated discovery.

^{45/} See Optel, Inc. v. American Cablesystems of California, Inc. d/b/a Continental Cablevision, Inc., DA 97-478, at 1 (rel. Mar. 6, 1997) (“Optel”); see also Program Access Order, 8 FCC Rcd

noted that “a policy favoring private settlement and alternative dispute resolution conserves Commission resources and is thus in the public interest.”^{46/} If a party desires full-blown litigation, rather than file a program access complaint, it should pursue an antitrust action in court, a right Congress preserved in the 1992 Cable Act.^{47/}

B. Awarding Damages Would Deter A Programmer From Charging Differential Rates For Legitimate Economic and Business Reasons

Section 628 and the Commission’s program access rules permit a programmer to engage in differential pricing for the distribution of its service based on several cost and benefit factors expressly delineated in both the statute and the rules.^{48/} Rate differentials reflecting factors such as penetration, offering of service, channel positioning, volume, delivery costs, promotional activities, and other factors are expressly permitted by the Commission’s rules.^{49/} The Commission’s rules state that “nothing” in the program access rules “shall preclude” programmers from imposing rate differentials based upon these factors.^{50/}

In reality, however, the ease with which a complainant can establish a *prima facie* program access complaint already deters differential pricing. Under the Commission’s rules, the mere existence of a rate differential suffices to establish a *prima facie* price discrimination case, thereby subjecting a programmer who engages in differential pricing to the costs and risks

at 3389, 3416.

^{46/} See Optel at 1.

^{47/} See Cable Television Consumer Protection and Competition Act of 1992, Pub. L. No. 102-385, § 27.

^{48/} See 47 U.S.C. § 548(c)(2)(B)(i)-(iii); 47 C.F.R. § 76.1002(b)(1)-(3).

^{49/} 47 C.F.R. § 1002(b)(1)-(3) & Notes 2-4.

^{50/} 47 C.F.R. § 76.1002(b).

associated with having to prove its innocence in a program access dispute.^{51/} To defend the price differential, a programmer may need to put together a detailed explanation essentially to account for every penny of difference. This is an arduous task that exposes the programmer's business judgment and economic decisionmaking to micromanagement and second guessing. The programmer faces a high risk in this process that the Commission will simply disagree with its economic analysis and order a rate reduction.

This risk escalates untenably if, in addition to the costs of litigation and the risks of a rate reduction, the Commission also awards damages, which could extend back several years under a contract. Faced with the risk that its legitimate economic justifications for a price differential will be rejected, especially if the value of intangible benefits cannot be easily quantified, a programmer may choose to forego charging the legitimate price differential rather than subject itself to this risk. This result would be contrary to Congress's intent to allow a programmer to set different rates based on legitimate cost and benefit factors, but it would be the inevitable outcome if defending every rate differential potentially subjects a programmer to substantial damages. Awarding damages would effectively deter legitimate business activity.

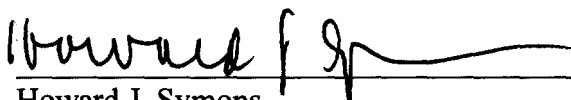
^{51/} Program Access Order, 8 FCC Rcd 3416, ¶ 125.

CONCLUSION

For the foregoing reasons, the Commission should reject proposals to extend the program access rules to terrestrially-delivered local and regional programming and to amend its program access complaint procedures or impose damages.

Respectfully submitted,

CABLEVISION SYSTEMS CORPORATION

A handwritten signature in black ink, appearing to read "Howard J. Symons", is written over a horizontal line.

Howard J. Symons
Christopher J. Harvie
Michael B. Bressman
Mintz, Levin, Cohn, Ferris
Glovsky and Popeo, P.C.
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004
202/434-7300

Its Attorneys

February 2, 1998

DCDOCS: 122187.6 (2m@306!.doc)

EXHIBIT 1

Want Movies And Sports?



PROGRAMMING

CHANNEL LINEUP

● ON-LINE
PROGRAM GUIDE

● PROGRAMMING
PACKAGES

● A LA CARTE
PROGRAMMING

● PACKAGES
AT A GLANCE

● CHANNEL
DESCRIPTIONS

● COMPARING
DIRECTV

● CHANNEL
LINEUP

● USSB

SEARCH

PROGRAMMING

PRICING

MOVIES

SPORTS

PRESS

Q&A

SALES

COMMERCIAL

DSS PRODUCTS

CUSTOMER SERVICE

HUMAN RESOURCES

FEEDBACK

HOME

DIRECTV® CHANNEL LINEUP - 1/1/98

New channels in red coming on 3/10/98

295	ABCE	ABC-WKRN (Nashville, TN)
296	ABCW	ABC-KOMO (Seattle, WA)
240	A&E	Arts & Entertainment Network
220	AMC	American Movie Classics
289	AHN	America's Health Network
248	ANP	Animal Planet
268	BET	Black Entertainment Television
274	BIT	Bloomberg Television
238	BRVO	Bravo
247	TOON	Cartoon Network
280	EYE	CBS Eye On People
290	WSEE	CBS-WSEE (Erie, PA)
291	CBSW	CBS-KPIX (San Francisco, CA)
283	ERTH	Channel Earth
305	CSN	Classic Sports Network
275	CNBC	CNBC
202	CNN	CNN
281	fn/I	CNNfn/CNN International
263	CMT	Country Music Television
255	COM	Comedy Central
203	CRT	Court TV
271	CSP1	C-SPAN
272	CSP2	C-SPAN2
245	DISC	Discovery Channel
242	DIS1	Disney Channel (East)
243	DIS2	Disney Channel (West)
217	E!	E! Entertainment Television
230	ENCE	ENCORE HITS
231	ENCW	ENCORE HITS WEST

232	LOVE	LOVE STORIES - encore 2
233	WSTN	WESTERNS - encore 3
234	MYST	MYSTERY - encore 4
235	ACTN	ACTION - encore 5
236	TRUE	TRUE STORIES - encore 6
237	WAM!	WAM! - encore 7
206	ESPN	ESPN
207	ESN2	ESPN2 (Channel number changing to 208 on 3/10/98)
208	ESNN	ESPNEWS (Channel number changing to 207 on 3/10/98)
258	FAM	The Family Channel
297	FOX	FOXNET
278	FNC	Fox News Channel
257	GAME	Game Show Network
304	GOLF	The Golf Channel
204	HLN	Headline News
241	HIST	The History Channel
214	H&G	Home & Garden Television
213	HSN	Home Shopping Network
239	IFC	Independent Film Channel
246	TLC	The Learning Channel
252	LIFE	Lifetime
276	MSNB	MSNBC
264	MTV	Music Television (MTV)
265	M2	M2 (MTV #2)
269	MUCH	MuchMusic
262	TNN	The Nashville Network
292	NBCE	NBC-WNBC (New York, NY)
293	NBCW	NBC-KNBC (Los Angeles, CA)
279	NWI	Newsworld International
249	NIK1	Nickelodeon (East)
250	NIK2	Nickelodeon (West)
251	TVLD	Nick at Nite's TV Land
307	OL	Outdoor Life
294	PBS	PBSNET
261	QVC	QVC
222	ROM	Romance Classics

254	SCFI	Sci-Fi Channel
306	SV	Speedvision
225	STZE	STARZ!
227	SZ2E	STARZ!2
226	STZW	STARZ! WEST
228	SZ2W	STARZ!2 WEST
259	TBS	Superstation TBS
256	WGN	Superstation WGN
212	TNT	TNT
286	TBN	Trinity Broadcasting Network
260	TRIO	TRIO
221	TCM	Turner Classic Movies
215	FOOD	TV Food Network
253	USA	USA Network
277	TWC	The Weather Channel
266	VH1	Video Hits -1 (VH1)

SPORTS

340 to 399	Professional and Collegiate Sports Subscriptions
------------	--

ADULT PROGRAMMING

400	ADLT	Adult Specials
401	ADLT	SPICE
402	PBTv	PLAYBOY TV

MUSIC CHOICE

501 to 531	Music Choice (now with song I.D.)
------------	-----------------------------------

REGIONAL SPORTS NETWORKS*

313	EMP	Empire Sports Network
329	FSAZ	FOX Sports Arizona
333	FOXB	FOX Sports Bay Area
323	FOXC	FOX Sports Chicago
322	FXCN	FOX Sports Cincinnati
320	FOXD	FOX Sports Detroit
327	FSMW	FOX Sports Midwest
309	FOXE	FOX Sports New England
312	FXNY	FOX Sports New York
330	FSNW	FOX Sports Northwest
321	FXOH	FOX Sports Ohio
315	FOXP	FOX Sports Pittsburgh
326	FSRM	FOX Sports Rocky Mountain
317	FXSS	FOX Sports South
325	FSSW	FOX Sports Southwest
331	FOXW	FOX Sports West
332	FSW2	FOX Sports West 2
316	HTS	Home Team Sports
310	MSG	Madison Square Garden
324	MSC	Midwest Sports Channel
311	NESN	New England Sports Network
319	SCFL	SPORTSCHANNEL Florida
318	SUN	Sunshine Network

DIRECTV INFORMATION CHANNELS

100, 200, 224	DIRECT TICKET® Previews
101 to 199	DIRECT TICKET Pay Per View Channels
101	DIRECTV Special Events
302, 337, 380	DIRECTV Sports Schedules
218	DIRECTV Access Card Channel
267, 308	DIRECTV Platinum Presents

handy reminder stickers

channel line up

2	WVIZ	33	GO!E	63	RSVD
3	WKYC NBC	34	ESPN	64	RSVD
4	WOIO CBS	35	ESPN	65	RSVD
5	WEWS ABC	36	AMC	66	RSVD
6	WLAB	37	BRAVO	67	RSVD
7	WBNA	38	EXTRA	68	RSVD
8	WTV FOX	39	HIT	69	RSVD
9	WGN	40	TV	70	RSVD
10	WTBS	41	TV	71	CINEMAX
11	WQHS	42	TV	72	FLIX
12	USA	43	TV	73	SHOWTIME
13	USA	44	SHOWTIME	74	SHOWTIME2
15	PREVUE	45	AM	75	TMC
16	SNEAK	46	HBO	76	ENCORE
17	QVC	47	HBO	77	STARZ
18	P.E.G.	48	HBO	78	HBO
19	LEASED ACC.	49	HBO	79	HBO2
20	RSVD.	50	CNN	80	HBO3
21	P.E.G.	51	CNN	81	viewcast
22	P.E.G.	52	HUN	82	viewcast
23	USA	53	CNN	83	viewcast
24	USA	54	ESPN	84	viewcast
25	USA	55	ESPN	85	viewcast
26	USA	56	ESPN	86	viewcast
27	USA	57	ESPN	87	viewcast
28	USA	58	ESPN	88	viewcast
29	USA	59	ESPN	89	viewcast
30	USA	60	ESPN	90	viewcast
31	USA	61	ESPN		
32	USA	62	ESPN		

americast's localcast™ americast's advantage™
americast's viewcast™ americast's viewcast™

americast™

at your service™ center
1-800-848-CAST

channel line-up

2	WVIZ	33	GO!E	63	RSVD
3	WKYC NBC	34	ESPN	64	RSVD
4	WOIO CBS	35	ESPN	65	RSVD
5	WEWS ABC	36	AMC	66	RSVD
6	WLAB	37	BRAVO	67	RSVD
7	WBNA	38	EXTRA	68	RSVD
8	WTV FOX	39	HIT	69	RSVD
9	WGN	40	TV	70	RSVD
10	WTBS	41	TV	71	CINEMAX
11	WQHS	42	TV	72	FLIX
12	USA	43	TV	73	SHOWTIME
13	USA	44	SHOWTIME	74	SHOWTIME2
15	PREVUE	45	AM	75	TMC
16	SNEAK	46	HBO	76	ENCORE
17	QVC	47	HBO	77	STARZ
18	P.E.G.	48	HBO	78	HBO
19	LEASED ACC.	49	HBO	79	HBO2
20	RSVD.	50	CNN	80	HBO3
21	P.E.G.	51	CNN	81	viewcast
22	P.E.G.	52	HUN	82	viewcast
23	USA	53	CNN	83	viewcast
24	USA	54	ESPN	84	viewcast
25	USA	55	ESPN	85	viewcast
26	USA	56	ESPN	86	viewcast
27	USA	57	ESPN	87	viewcast
28	USA	58	ESPN	88	viewcast
29	USA	59	ESPN	89	viewcast
30	USA	60	ESPN	90	viewcast
31	USA	61	ESPN		
32	USA	62	ESPN		

americast's localcast™ americast's advantage™
americast's viewcast™ americast's viewcast™

americast™

at your service™ center
1-800-848-CAST

Your parental control number:

--	--	--	--	--

at your service™ center 1-800-848-CAST

Your americast's viewcast access number:

--	--	--	--	--

at your service™ center 1-800-848-CAST

Your parental control number:

--	--	--	--	--

at your service™ center 1-800-848-CAST

Your americast's viewcast access number:

--	--	--	--	--

at your service™ center 1-800-848-CAST

americast™

© Copyright 1996 Ameritech Corp.
Z210310896 C1e

at your service™ center 1-800-848-CAST

Enjoy The Best Channels On TV!

LOCALCAST	
2	WCBS (2) CBS
3	WFSB (3) CBS
4	WNBC (4) NBC
5	WNYW (5) FOX
6	WVIT (30) NBC
7	WABC (7) ABC
8	WTNH (8) ABC
9	WWOR (9) UPN
10	WEDW (49) PBS
11	WPIX (11) WB
12	WRNN (62) IND
13	WNET (13) PBS
14	WTVX (20) UPN
15	WTIC (61) FOX
16	PUBLIC ACCESS
17	EDUCATION ACCESS
18	GOVERNMENT ACCESS
19	STATE ED. CH. (CCIT)
20	CSPAN
21	WXTV (41) UNIVISION
22	PREVUE
23	WTBS
24	WLW (21) PBS
25	WLNY (55) IND
26	WTBY (54) TBN
27	WHA! (43) IND
28	WHSI (67) HSN
29	WBIS (31) IND
30	WNJU (47) TELEMUNDO
PREMIERCAST	
31	SCI-FI CHANNEL
32	NICKELODEON
33	LIFETIME
34	EI

35	USA NETWORK
36	TNT
37	CARTOON NETWORK
38	COMEDY CENTRAL
39	MTV
40	VH-1
41	A&E
42	TLC (THE LEARNING CHANNEL)
43	CNN
44	CNNfn
45	HEADLINE NEWS
46	CNBC
47	DISCOVERY CHANNEL
48	ANIMAL PLANET
49	THE DISNEY CHANNEL
50	ESPN
51	ESPN2
52	ESPNEWS
53	MSG
54	CSN (CLASSIC SPORTS NETWORK)
55	SPORTS CHANNEL NY
56	THE GOLF CHANNEL
57	RESERVED
58	TNN
59	AMC
60	THE WEATHER CHANNEL
61	TCM (TURNER CLASSIC MOVIES)
62	COURT TV
63	THE HISTORY CHANNEL
64	FOOD NETWORK
65	HGTV (HOME & GARDEN TELEVISION)
66	INSP
67	FAMILY CHANNEL
68	BET

PREMIUM	
69	HBO
70	HBO2
71	HBO3
72	HBO FAMILY
73	CINEMAX
74	CINEMAX2
75	SHOWTIME
76	SHOWTIME2
77	TMC (THE MOVIE CHANNEL)
78	SUNDANCE
79	ENCORE
80	STARZ!
81	STARZ!2

PAY-PER-VIEW	
82	PAY-PER-VIEW 1
83	PAY-PER-VIEW 2
84	PAY-PER-VIEW 3
85	SPICE

Look At The Value!

BASIC AND EXPANDED SERVICE	PER MONTH
Localcast	\$11.95
Premiercast (Includes Localcast Rate)	\$26.95
PREMIUM SERVICES	PER MONTH
Home Box Office Advantage (Includes HBO, HBO2, HBO3, HBO Family & 1 Addressable Converter Box)	\$12.95
Showtime Advantage (Includes Showtime, Showtime2, The Movie Channel, Sundance & 1 Addressable Converter Box)	\$12.95
Cinemax Advantage (Includes Cinemax, Cinemax2, & 1 Addressable Converter Box)	\$12.95
Any Two Advantage Packages (Choose from HBO Advantage, Showtime Advantage or Cinemax Advantage; Includes 1 Addressable Converter Box)	\$19.95
All Three Advantage Packages (Includes HBO Advantage, Showtime Advantage, Cinemax Advantage & 1 Addressable Converter Box)	\$25.95
Full Advantage (Includes HBO Advantage, Showtime Advantage, Cinemax Advantage, Starz!, Starz!2, Encore & 1 Addressable Converter Box)	\$29.95
Starz!, Starz!2, Encore	\$5.95
Starz!, Starz!2, Encore With Any Advantage Package	\$4.00
The Movie Channel	\$5.95
Sundance	\$5.95
Addressable Converter Box Rental (Includes Remote Control)	\$3.50
Non-Addressable Converter Box Rental (Includes Remote Control)	\$1.50
PAY-PER-VIEW	
Pay-Per-View Movies	Prices vary
Special Pay-Per-View Events	depending on
And Spice	service

SNET americast is changing
cable television for the better.

Call 1-800-556-SNET to subscribe.
(1-800-556-7638)

All programming subject to change.

©1997 SNET Inc



Residential Channel Selections

2. WGBH - Ch. 2 (PBS)
3. Reserved for Future Use
4. WBZ - Ch. 4 (CBS)
5. WCVB - Ch. 5 (ABC)
6. WFXT - Ch. 25 (FOX)
7. WHDH - Ch. 7 (NBC)
8. Sneak Preview - Pay-Per-View schedule
9. WGN - Ch. 9, Chicago - Superstation
10. WLVI - Ch. 56 (WB)
11. WSBK - Ch. 38 (UPN)
12. WABU - Ch. 68 (Independent)
13. WTBS - Ch. 17, Atlanta - Superstation
14. WGBX - Ch. 44 (PBS) - Coverage of Mass. Legislature
15. Preview Channel
16. Reserved for Future Use
17. WUNI - Ch. 27 (Independent)
18. C-SPAN - U.S. House of Reps coverage, public affairs
19. C-SPAN 2 - U.S. Senate coverage, public affairs
20. Reserved for Future Use
21. WMFP - Ch. 62 (Independent)
22. WSHH - Ch. 66 (Independent)
23. QVC - Quality, Value, Convenient Shopping
24. Reserved for Future Use
25. EWTN
26. AMC* - 50 years of classic movies
27. Turner Classic Movies - The greatest movies of all time
28. FXM - Movies from FOX Studios
29. Sundance Channel - Robert Redford's new film channel
30. Independent Film* - Features, shorts, cult classics
31. Bravo* - Foreign films, drama, dance
32. TNT - Movies, kids' shows, NFL Football, NBA Basketball
33. ESPN - The Total Sports Network, 24 hour sports a day
34. ESPN 2 - Sports with an attitude, NHL hockey, "Extreme" sports
35. ESPNNews - Sports news 24 hours a day
36. SportsChannel NE* - Boston Celtics
37. NESN (New England Sports Network) - Boston Bruins & Red Sox
38. Classic Sports Network - Great moments in sports history
39. Golf Channel - need description
40. CNN SI - Sports news from CNN and Sports Illustrated
41. Weather Channel - 24 hour local and national weather
42. America's Health - Health and medical information
43. Family Channel - Programming for the entire family
44. USA - America's favorite cable network!
45. Lifetime - Entertainment, information for today's women
46. CNN - news, business, sports, weather
47. Headline News - News, weather, sports, every half hour
48. CNN/n - Financial and International news
49. Bloomberg TV - Detailed business news, 24 hours a day
50. CNBC - Consumer News and Business
51. MSNBC - News channel from Microsoft & NBC
52. FOX News* - Variety of news information
53. Court TV - Live Courtroom coverage
54. Nickelodeon - Children's programs, classic shows at night
55. Disney Channel - Family entertainment, cartoons, specials
56. Cartoon Network - Your favorite cartoons 24 hours a day!
57. TV Land - Classic shows 24 hours a day
58. A&E - Quality documentaries, comedy and arts
59. Ovation - Experience the full spectrum of the arts
60. History Channel - Documentaries, historical specials
61. Discovery - Adventure, nature, technology, global exploration
62. Learning Channel - Science, world cultures, history
63. Mind Extension University - Educational programs for adults
64. TV Food Network - Recipes and cooking tips from famous chefs
65. Home & Garden - Everything you love about home
66. Travel Channel - See and learn about places around the world
67. SCI-FI - Classic science fiction series, original programs, movies
68. Comedy Central - Stand-up comedy, sitcoms, movies, classics
69. E! - Updates on the entertainment industry's hottest stories
70. Game Show Network - Live, interactive games shows
71. Reserved for Future Use
72. MTV - Music videos, rock, rap, news, specials
73. VH-1 - Adult contemporary videos, comedy specials
74. Nashville Network - Videos, music shows, auto racing
75. CMT - Country music video
76. BET - Entertainment, music, news, sports
77. ZMusic Television - Contemporary music videos
78. International Channel - News & entertainment in 22 languages
79. Galavisión - Spanish language movies, sports, news
80. Reserved for Future Use
81. Reserved For Cable Modem Use
82. HBO
83. HBO 2
84. HBO 3
85. HBO West
86. HBO Family
87. CINEMAX
88. CINEMAX 2
89. MOVIE CHANNEL
90. SHOW TIME
91. STARZ
92. ENCORE
93. Reserved for Future Use
94. StarCinema 94
95. StarCinema 95
96. StarCinema 96
97. StarCinema 97
98. StarCinema 98
99. Space Movie
100. Adult & Family

NESN

★ RCN Variety Video
★ RCN Premium Channels
★ Pay-Per-View Channels
Selections Subject to Change
*Launch date to be announced

Music Choice and
SEGA Channel
also available

CELLULARVISION OVER CHANNEL

1	<u>BB/RABC</u>	Bloomberg Information News/Russian American Broadcasting CO.
2	<u>WCBS</u>	CBS
3	<u>TWC</u>	The Weather Channel
4	<u>WNBC</u>	NBC
5	<u>WNYW</u>	FOX
6	<u>HBO</u>	Home Box Office
7	<u>WABC</u>	ABC
8	<u>ESPN</u>	ESPN Sports Network
9	<u>UPN</u>	UPN
10	<u>CNN</u>	Cable News Network
11	<u>WPIX</u>	WPIX
12	<u>TBS</u>	TBS
13	<u>WNET</u>	PBS
14	<u>A&E</u>	Arts & Entertainment
15	<u>USA</u>	USA Network
16	<u>TCM</u>	Turner Classic Movies
17	<u>LIFE</u>	Lifetime
18	<u>DISC</u>	The Discovery Channel
19	<u>CVDN</u>	Cellular Vision Digital Network
20	<u>TNT</u>	Turner Network Television
21	<u>DIS</u>	The Disney Channel
22	<u>NICK</u>	Nickelodeon
23	<u>ENC</u>	Encore
24	<u>ENC+</u>	Encore Plus
25	<u>CNBC</u>	CNBC
26	<u>HN</u>	Headline News
27	<u>CSPAN</u>	Cspan
28	<u>TLC/CMDY</u>	The Learning Channel/Comedy Central
29	<u>BET</u>	Black Entertainment Channel
30	<u>Tele</u>	Telemundo
31	<u>INT</u>	The International Channel
32	<u>PVG</u>	The Prevue Guide
33	<u>FOOD</u>	TV Food Network
34	<u>E!</u>	E! Entertainment
35	<u>SCIFI</u>	Science Fiction Channel
36	<u>MTV</u>	Music Television
37	<u>VH-1</u>	VH-1

38	<u>ESPN2/MSG2</u>	ESPN2/MSG2
39	<u>MSG</u>	Madison Square Garden
40	<u>SHO</u>	Showtime
41	<u>TMC</u>	The Movie Channel
42	<u>MAX</u>	Cinemax
43	<u>STZ!</u>	Starz!
44	<u>FLIX</u>	FLIX
45	<u>SPTSCH</u>	SportsChannel
46	<u>CT/PBY</u>	Court TV/Playboy
47	<u>VC</u>	Viewers Choice
48	<u>HC</u>	Hot Choice
49	<u>MSNBC</u>	MSNBC

Programming Descriptions

Bloomberg (BB)

Bloomberg Provides continuous 24-hour coverage of worldwide business and financial news. Many news sources contribute news and financial information to Bloomberg each day.

Russian American Broadcasting CO.

A premier national Russian network, RABC provides series of movies, live satellite news, music and entertainment shows.

CBS

Channel two is the local affiliate for CBS. Programming on CBS consists of sports, The Late Show, breaking news stories, documentaries and much more.

The Weather Channel (TWC)

Live 24-hour, up to the minute forecasts. Regional and national weather information.

NBC

Channel four is the local affiliate for NBC. Programming includes hit series, breaking news, sporting events and much more.

WNYW (FOX)

Channel five is the local affiliate for FOX. Fox features news, NFL football, hit shows, sporting events and much more.

Home Box Office (HBO)

HBO offers a mix of major Hollywood theatrical movies, original movies and series, sporting events and comedy specials. HBO is the most widely awarded premium service.

ABC

Channel seven is the local affiliate for ABC. ABC features sporting events, news, movie specials and more.

Entertainment Sports Program Network (ESPN)

ESPN features the most diverse schedule of sports programming available including Hockey, NFL, Basketball, Baseball, college sports and sportstalk shows.

UPN

Channel nine is the local affiliate for UPN. UPN programming includes talk shows, hit shows, news and

CERTIFICATE OF SERVICE

I, Michael B. Bressman, hereby certify that on this 2nd day of February 1998, I caused copies of the foregoing "Comments of Cablevision Systems Corporation" to be sent to the following by hand delivery:

The Honorable William E. Kennard
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

The Honorable Susan P. Ness
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20554

The Honorable Harold Furchgott-Roth
Federal Communications Commission
1919 M Street, N.W., Room 822
Washington, D.C. 20554

The Honorable Michael Powell
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554

The Honorable Gloria Tristani
Federal Communications Commission
1919 M Street, N.W., Room 826
Washington, D.C. 20554

John Nakahata
Chief of Staff
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Susan Fox
Senior Legal Advisor
Office of Commissioner William E. Kennard
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Thomas Power
Legal Advisor
Office of Commissioner William E. Kennard
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Anita Wallgren
Legal Advisor
Office of Commissioner Susan P. Ness
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20554

Helgi Walker
Legal Advisor
Office of Commissioner Harold Furchgott-Roth
Federal Communications Commission
1919 M Street, N.W., Room 822
Washington, D.C. 20554

Jane Mago
Legal Advisor
Office of Commissioner Michael Powell
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554

Rick Chesson
Legal Advisor
Office of Commissioner Gloria Tristani
Federal Communications Commission
1919 M Street, N.W., Room 826
Washington, D.C. 20554

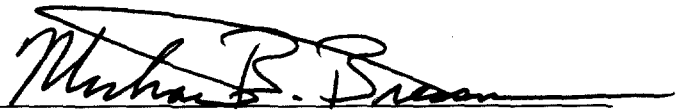
Meredith J. Jones
Chief
Cable Services Bureau
Federal Communications Commission
2033 M Street, N.W., Room 918
Washington, D.C. 20554

Deborah Klein
Assistant Division Chief
Cable Services Bureau
Federal Communications Commission
2033 M Street, N.W., 7th Floor
Washington, D.C. 20554

ITS
1231 20th Street, N.W.
Washington, D.C. 20036

John Logan
Deputy Chief
Cable Services Bureau
Federal Communications Commission
2033 M Street, N.W., Room 918
Washington, D.C. 20554

Steven Broeckaert
Attorney Advisor
Cable Services Bureau
Federal Communications Commission
2033 M Street, N.W., Room 705B
Washington, D.C. 20554



Michael B. Bressman

DCDOCS: 122643.1 (2mmr01!.doc)